



Registered Charity No. SCO46868

## **Data Protection Policy (2021 rev1)**

### **What we need**

Menzieshill Whitehall Swimming and Water Polo Club is a voluntary charity organisation affiliated with the Midland District and Scottish Swimming (SASA).

Menzieshill Whitehall Swimming and Water Polo Club will be a “controller” of the personal information that you provide to us in the membership form, unless otherwise stated.

Members’ personal data:

When you register as a member of Menzieshill Whitehall Swimming and Water Polo Club or renew your membership (including if you are registering or renewing on behalf of a child under the age of 16), we will ask you for the following personal information:

- contact details: – name, address, email address, emergency phone number and date of birth;
- membership criteria / category – for example, Swimmer, Learn to Swim, Adult Improver, volunteer, etc.;
- payment details – bank account number, sort code, card details, etc.;
- equality information – for example gender identity etc;
- Relevant Medical Information, PVG membership and training records if applicable.
- Our Club management software “Team Unify (and parent company SportsEngine Inc.) will also securely hold members’ bank card details.

### **Why we need your personal information – contractual purposes**

Members’ personal data:

We need to collect our members’ personal information so that we can manage your membership. We will use our members’ personal information to:

- provide you with core member services, including insurance, licensing and PVG checks;
- set up your online membership account and administer your account online;
- send you membership communications by post or email in relation to essential membership services, including but not limited to, pool closures, general club updates, membership renewals, all galas and membership fees’ information.

If you do not provide us with all of the personal information that we need to collect, then this may affect our ability to offer the above membership services and benefits.

## **Why we need your personal information – legitimate purposes**

Members' personal data:

We also process our members' personal information in pursuit of our legitimate interests to:

- promote and encourage participation in swimming and water polo by sending members' communications and booking information for upcoming competitions and events. Our competitions and events may be filmed or photographed, and your personal information may also be used in images captured from our competitions and events, which we use for promotional, education and development purposes;
- provide competition in swimming and water polo by accepting and managing entries for our competitions and checking your personal information to ensure you are entered into the correct category;
- monitor and develop participation in swimming and water polo by monitoring members' engagement and participation by inviting our members to participate in surveys for researching and development purposes;
- invite our members as award winners or guests to our annual awards, which includes asking our members to nominate individuals for awards and shortlisting such individuals to select the winners, who we will then contact by email;
- develop and maintain our members' qualifications, including sending email communications to members to inform you of upcoming courses, renewal requirements and verify that you have completed any mandatory training and PVG / child protection requirements;
- Supply essential medical, dietary and contact details to team managers as required for trips and competitions;
- respond to and communicate with members regarding your questions, comments, support needs or complaints, concerns or allegations in relation to swimming and water polo. Complaints and disciplinary procedures, for example, we will use your personal information to investigate your complaint, to suspend membership or take disciplinary action; and
- promoting achievements in the public domain, for example, newspaper/radio/television/social media.

A PVG check under the Protection of Vulnerable Groups (Scotland) Act 2007 is required for coaches, poolside helpers, Covid-19 Officers, lifeguards or anyone who would be in charge of children. Personal data is required when completing a PVG form and self declaration form (providing two references). These forms are sent to Scottish Swimming. Only the person who is being PVG checked will receive their PVG certificate. The Club does not retain the PVG certificate number. The Club CPO will receive notification from Scottish Swimming of who has been PVG checked. If information relating to criminal convictions or alleged commission of criminal offences comes to light through the PVG system, the CPO within the Club will be notified. We will have a legitimate interest to collect references and any other applicable information to allow us to consider whether or not you can volunteer in a regulated role with children and/or vulnerable adults.

Where we process your personal information in pursuit of our legitimate interests, you have the right to object to us using your personal information for the above purposes. If you wish to object to any of the above processing, please contact us at [secretary@menzieshillwhitehall.co.uk](mailto:secretary@menzieshillwhitehall.co.uk). If we agree and comply with your objection, this may affect our ability to undertake the tasks above for the benefit of you as a member.

## **Why we need your personal information – legal obligations**

We are under a legal obligation to process certain personal information relating to our members, for the purposes of complying with our obligations under:

- Charities and Trustee Investment (Scotland) Act 2005 to maintain a register of our members, which includes our members' name, address, the date they were admitted to membership and the date on which they ceased to be our member and hold general meetings in accordance with the Clubs Constitution.
- the Protection of Vulnerable Groups (Scotland) Act 2007 to check that our coaches and volunteers are able to undertake regulated work with children and vulnerable adults;
- applying for grants for example to Sportscotland which may require contact details: name, address, e-mail address and
- the Equality Act 2010, which requires us to process personal information to make reasonable adjustments where necessary.

## **Other uses of your personal information**

We may ask you if we can process your personal information for additional purposes. For example, another clubs research. Where we do so, we will provide you with an additional privacy notice with information on how we will use your information for these additional purposes.

## **Who we share your personal information with?**

If your personal information is included in any images or videos taken by us at our competitions and events, we may share this with SASA for promotional and/or journalistic purposes.

We may be required to share personal information with statutory or regulatory authorities and organisations to comply with statutory obligations. Such organisations include the Health & Safety Executive, Disclosure Scotland, and Police Scotland for the purposes of safeguarding children and vulnerable adults.

We may also share personal information with our professional and legal advisors for the purposes of taking advice.

Menzieshill Whitehall Swimming and Water Polo Club employs third party suppliers to provide services, including IT and financial bookkeeping. These suppliers may process personal information on our behalf as "processors" and are subject to written contractual conditions to only process that personal information under our instructions and protect it.

In the event that we do share personal information with external third parties, we will only share such personal information strictly required for the specific purposes and take reasonable steps to ensure that recipients shall only process the disclosed personal information in accordance with those purposes.

SASA members' personal data - as an affiliated club of SASA we are required to ensure that all of our members are members of SASA as a condition of our registration / membership / affiliation.

We will share name, address, e-mail and emergency contact Phone number for registration purposes with SASA who will become a controller of your personal information when they receive it. SASA's privacy notice explains how they use your personal information and can be accessed <https://www.scottishswimming.com/membership/data-protection.aspx>

## **How we protect your personal information**

Your personal information is stored on our electronic filing system (Hy-Tek Team Manager) and our cloud-based account with Team Unify (and parent company SportsEngine Inc.) and on the personal computers of authorised club volunteers and is accessed by our assigned volunteers for the purposes set out above.

We are required to transfer your personal information out with the UK for the purposes of entering swimmers/waterpolo players into competitions and booking travel arrangements for training camps. Where your personal information is transferred out with the UK, we will provide you with information regarding the safeguards that we have put in place with the recipient country to protect your personal information.

## **How long we keep your personal information**

Members' personal data: -

We will only keep your personal information for as long as necessary to provide you with membership services. Unless you ask us not to, we will review and possibly delete your personal information where you have not renewed your membership with us for One year.

We will archive all relevant personal data for a maximum of 7 years to cover all eventualities, for example, complaints/child wellbeing information.

## **Your rights**

You can exercise any of the following rights by writing to us at [secretary@menzieshillwhitehall.co.uk](mailto:secretary@menzieshillwhitehall.co.uk)

Your rights in relation to your personal information are:

- you have a right to request access to the personal information that we hold about you by making a "subject access request";
- if you believe that any of your personal information is inaccurate or incomplete, you have a right to request that we correct or complete your personal information;
- you have a right to request that we restrict the processing of your personal information for specific purposes; and
- if you wish us to delete your personal information, you may request that we do so.

Any requests received by Menzieshill Whitehall Swimming and Water Polo Club will be considered under applicable data protection legislation. If you remain dissatisfied, you have a right to raise a complaint with the Information Commissioner's Office at [www.ico.org.uk](http://www.ico.org.uk)

Once you submit your preferences to us, we will send you an email to confirm these. Please note that we will not email you with any information until you have confirmed your preferences by responding to our email.

You may change your preferences at any time or request that we stop sending you email communications by contacting us at [secretary@menzieshillwhitehall.co.uk](mailto:secretary@menzieshillwhitehall.co.uk)